

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
ANDREW WONG
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Andrew_Wong@fd.org
6 Attorney for Rafael Ascanio Chavez
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 RAFAEL ASCANIO CHAVEZ,
15 Defendant.

Case No. 2:18-mj-968-CWH

**STIPULATION TO ALLOW
DEFENDANT TO APPEAR
TELEPHONICALLY**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Andrew
20 Wong, Assistant Federal Public Defender, counsel for Rafael Ascanio Chavez, that Defendant
21 be allowed to appear telephonically or in the alternative via video for the bench trial scheduled
22 for Wednesday, May 1, 2019 at 9:00 a.m.

23 This Stipulation is entered into for the following reasons:

- 24 1. The parties have reached a resolution in this matter.
25 2. Mr. Chavez lives and works in Los Angeles, California.
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1 3. Under the parties' agreement, Mr. Chavez may well incur more costs and
2 expenses if he was required to travel to Las Vegas than he would face as punishment under the
3 proposed resolution.

4 This is the first request to allow Defendant to appear telephonically or in the alternative
5 via video filed herein.

6 DATED this 23rd day of April, 2019.

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8 RENE L. VALLADARES
9 Federal Public Defender

 NICHOLAS A. TRUTANICH
 United States Attorney

10 By /s/ Andrew Wong
11 ANDREW WONG
12 Assistant Federal Public Defender

 By /s/ Linda Mott
 LINDA MOTT
 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RAFAEL ASCANIO CHAVEZ,

7 Defendant.

Case No. 2:18-mj-968-CWH

PROPOSED ORDER

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10 **PROPOSED ORDER**

11 IT IS THEREFORE ORDERED that Mr. Chavez may appear telephonically for his May
12 1, 2019 change of plea.

13 DATED this 26 day of April, 2019.

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17 UNITED STATES DISTRICT JUDGE
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